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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	YUEHENG XU	§	Group Art Unit:	2176
Serial No.:	09/748,895	§		
Filed:	December 27, 2000	§	Examiner:	Chau T. Nguyen
For:	LARGE CHARACTER SET BROWSER	§	Atty. Dkt. No.:	ITL.0403US (P8986)

Mail Stop **Appeal Brief-Patents**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Sir:

Appellant respectfully files this Reply Brief in response to the Examiner's Answer mailed on September 18, 2007.

I. REPLY

To support a §103(a) rejection, there needs to be valid rationale that a person of ordinary skill would have been motivated to combine prior art references to achieve the claimed subject matter, and that there would have been a reasonable expectation of success. Examination Guidelines for Determining Obviousness, 72 Federal Register, 57534 (October 10, 2007). It is respectfully submitted that the Examiner fails to provide either: (1) a teaching, suggestion, or

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Stephanie Petros

motivation to modify the Powell reference and; (2) a finding of reasonable expectation of success in this regard.

In this regard, the Examiner purports to modify Powell, stating that a conversion to a second code format having a multiple double-byte length “must” occur. Examiner’s Answer, p. 9. However, there is no support in the record for this contention. Simply put, the Examiner is using a bootstrap or circular reasoning to somehow state that if an input digital document representation is expressed in a multiple byte character set, a resulting two-dimensional character “must be” in a multiple double-byte length format. Nothing in the references supports this contention. Furthermore, the input of a multiple byte character bit is nowhere expressed in the claims. Instead, the claims recite that when characters of a certain code format (i.e., a second type), are received they are converted to a multiple double-byte length. Nothing in Powell anywhere teaches or suggests this multiple double-byte length. Nor does anything in Rojas. Instead, Rojas simply teaches the conversion of a single-byte character to a double-byte equivalent. As nothing in either of the references lends support to the Examiner’s bootstrap argument, the rejection is improper and should be reversed. Thus even when combined, the references fail to teach or suggest conversion to this multiple double-byte length.

The obviousness rejection fails for the further reason that modification of the primary reference, Powell, with Rojas in the manner suggested by the Examiner would defeat the principle of operation of the system of Powell and/or render its performance unsatisfactory. M.P.E.P. § 2143.01. That is, in Powell, an input document is analyzed using a statistical analysis to generate either a two-dimensional or three-dimensional model to determine whether an input document has a given primary language or primary language and character set in a given sample representation. The Examiner has presented nothing to indicate why one of ordinary skill in the

art would be motivated to modify these one-dimensional and three-dimensional statistical mappings with the double-byte character sets of Rojas. Simply put, there is a predetermined statistical analysis performed in Powell, and there is no suggestion or motivation to take the double-wide character set used for translating software programs in Rojas for use in this statistical analysis. As such, the § 103 rejection fails and all pending claims are patentable.

As to dependent claims 2, 12 and 22, the Examiner purports to rely on yet a fourth reference, Lincke, for teaching of receipt of a web page in a plane, row and column format, conceded to be missing from the three references used to reject the independent claims. However, the Examiner fails to even contend that Lincke teaches such plane, row and column format. Instead, the Examiner only contends that “Lincke discloses web pages includes graphic, text, frame, tables (columns and rows), form, etc.” Answer, p. 14. Furthermore, the Examiner fails to provide any modification of this reference (or any of the others) to supply this missing “plane, row and column format.” Instead, all the Examiner refers to is column 3, line 6 – 33 and column 21, line 65 – column 22, line 8 of Lincke. For ease of illustration, both of the recited portions are reproduced below:

An important source of Internet based data is the data accessible through the World Wide Web (referred to as the Web). The following describes the usual techniques for Web browsing. A user selects a web site associated with a URL (Uniform Resource Locator). The URL represents the address of the entry point to the web site (e.g., the home page for the web site). For example, the user may select a web site that supplies restaurant reviews. The user's computer (the client) makes an HTTP (HyperText Transport Protocol) request to the web server hosting the web site. The client typically needs to make multiple HTTP requests of the web server. For example, to load the restaurant locator home page, multiple HTTP requests are needed to download all the graphics, frame content, etc. Next, the user will typically need to browse through a number of linked pages to get to the page from which a search for restaurants can be made. Even if the user is immediately presented with the desired page, a great deal of information has had to been downloaded from the web site (e.g., graphics, advertisements, etc.). This additional information makes for a visually rich browsing experience. The user fills in the information on this page and selects a search button. The client makes

another series of HTTP requests of the web server. The web server supplies the client with the requested information in an HTML formatted web page. The web page typically includes links to more graphics and advertisements that need to be accessed by the client.

Lincke, col. 3, lns. 6 - 33

Compact Markup Language (CML)

In order to send web content to the wireless client 405 in a minimal number of bytes, the proxy server 180 does not use the HTML standard generally used by Internet servers. In HTML, all the tags and attributes associated with text, tables, forms, etc are text based, typically take up from 3 to 10 bytes each, and are stored both at the beginning and end of the text that they modify. For example, to display emphasized text, a web document would have to contain the following HTML sequence: This is emphasized text.

Lincke, col. 22, ln. 6 – col. 22, ln 8.

As clearly shown in these passages, Lincke nowhere teaches or suggests presence of a web page in a plane, row and column format. Without a teaching or suggestion of this subject matter in any of the references, the rejection of these dependent claims is clearly erroneous and should be reversed.

II. CONCLUSION

For the reasons set forth herein, as well as set forth in the Appeal Brief, Appellant respectfully requests that the final rejection be reversed and that the claims subject to this Appeal be allowed to issue.

Respectfully submitted,

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